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BY ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and one of the attorneys assigned to the defense of the above-referenced matter. Defendants write, with Plaintiffs' consent, to respectfully request that the Court permit the parties to schedule a deposition beyond the current June 16, 2023 deadline for depositions.

The deposition of former Sergeant Stuart Wohl was scheduled for June 16, 2023.¹ It has come to our attention that Sgt. Wohl is unavailable to appear for the deposition on June 16, 2023 due to a family obligation. Unfortunately, the dates prior to June 16th that Defendants proposed (June 12th – June 15th) conflict with Plaintiffs' schedule. As an alternative, Plaintiffs proposed June 23, 2023 and Defendants agreed. This is the parties first request to reschedule Sgt. Wohl's deposition.

Accordingly, it is respectfully requested that the Court permit the parties to schedule the deposition of Stuart Wohl on June 23, 2023.

Thank you for your time and attention to this matter.

¹ Recently, the Court limited the timing of the deposition of Sgt. Wohl to three hours and the scope of the deposition exclusively to the topic of training on Constitutional Policing at Community Events that was developed following the 2020 protests. See Docket No. 1037.

Respectfully submitted,

Peter Scutero /s

Peter Scutero
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cc: ALL COUNSEL (via ECF)